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> WRITER'S EMAIL: aolson@ccmpt.com

WWW.CCMPT.COM

ORANGE COUNTY

LOS ANGELES

SAN FRANCISCO

SACRAMENTO

FRESNO

July 13, 2020

Adam Stoller, M.D. 490 Post St., Ste. #909 San Francicso, CA 94102

Adam Stoller, M.D. 1900 O'Farrell Street, Suite 190 San Mateo, CA 94403

Re:

Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

WCAB No:

ADJ12031731

Claim No:

040519008736

Dear Dr. Stoller:

The parties have additional questions, to be addressed via supplemental report prior to this Applicant's re-evaluation. At your earliest convenience, please review both of the attached letters and incorporate them into one supplemental report.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

AMY E. OLSON

AEO/mg

CC:

Mario Castro/Chubb Group of Insurance Companies (Via Email Only)

lana Zadneprovskaia, Esq./Farber & Company



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April 20, 2020

Adam Stoller, M.D. 1900 O'Farrell St., Ste. #190 San Mateo, CA 94403

Re:

Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

WCAB No:

ADJ12031731

Claim No:

040519008736

Dear Dr. Stoller:

Thank you for your assistance on the above-referenced matter. You evaluated this Applicant on January 23, 2020, and you have issued supplemental reports upon receipt and review of requested diagnostics. Applicant had not achieved Permanent and Stationary status as of your January report.

I am requesting that you provide a Whole Person Impairment based on applicant's condition at the time of your January evaluation and the subsequent diagnostic studies.

If possible, please provide an estimated final Whole Person Impairment, assuming Applicant achieves positive results with additional treatment.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

AMY E. OLSON

AEO/mg

cc: per attached Proof of Service

COLANTONI COLLINS LADERA RANCH SECRET MARQUEZ 2 855-396-1220 124 MAIL-LR@CCMPT.COM 3 PROOF OF SERVICE BY MAIL 4 JONATHAN SHOCKLEY v. BIOTELEMETRY, INC. DBA CARDIONET, LLC 5 WCAB NO. ADJ12031731 6 I, Maria Garcia, declare as follows: 7 I am over the age of 18 years, and not party to this action. My business address is 555 Corporate Drive, Suite 205, Ladera Ranch, CA 92694, which is located in the county where the mailing described 8 took place. 9 I am readily familiar with the business practice at my place of business for collection and 10 processing of correspondence for mailing with the United States Postal Service. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary 11 course of business. 12 On, April 27, 2020, at my place of business at San Francisco, California, a copy of the following 13 documents: 14 CORRESPONDENCE TO DR. ADAM STOLLER DATED 04/20/2020 - REQUEST FOR SUPPLEMENTAL REPORT. 15 were placed for deposit in the United States Postal Service in a sealed envelope, with postage fully 16 prepaid, addressed to: 17 Via Email Only Adam Stoller, M.D. 18 Mario Castro 1900 O'Farrell St., Ste. #190 Chubb Group of Insurance Companies San Mateo, CA 94403 19 PO Box 42065 Phoenix, AZ 85080 20 21 Iana Zadneprovskaia, Esq. Farber & Company 22 333 Hegenberger Road, Suite 504 Oakland, CA 94621 23 24 and that envelope was placed for collection and mailing on that date following ordinary business practices. I declare under penalty of perjury under the laws of the State of California that the 25 foregoing is true and correct. Executed on April 27, 2020. 26 27 By: Maria Garcia

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ORANGE COUNTY LOS ANGELES

SAN FRANCISCO

SACRAMENTO

FRESNO

June 16, 2020

PANEL QUALIFIED MEDICAL EVALUATOR INTERROGATORY REQUEST FOR SUPPLEMENTAL REPORT

Adam J. Stoller, M.D. 490 Post St., Ste. #900 San Francisco, CA 94102

Re:

Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

WCAB No:

ADJ12031731

Claim No:

040519008736

Dear Dr. Stoller:

Thank you for your continued assistance in the above referenced matter. You have now had the opportunity to review bilateral upper extremity EMG's, and an MRI of the neck.

It appears that Applicant has some pathology to the neck, but it is unclear how this is related to his job. Please provide a detailed analysis as to the causation of Applicant's neck impairment. Please discuss what at-work activities contributed to the neck impairment, and what efforts you took to rule out nonindustrial causes of the neck complaints.

If applicant filled out any questionnaires, or if you took any chart notes, outlining these issues, please include those with your report.

Your efforts in sending your report at your earliest convenience will be greatly appreciated.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

AMY OLSON

AEO/mg

Schedule of records from 05/29/2019 to present

CC:

Mario Castro/Chubb Group of Insurance Companies (Via Email Only)

lana Zadneprovskaja, Esq./Farber & Company

Re: Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

June 16, 2020

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SCHEDULE OF RECORDS

Description

2019.02.19 - DWC-1 Claim Form

2020.04.06- Med Legal Supplemental Report - Adam Stoller MD

2020.04.03- MRI Report - Cervical Spine w/o Contrast - Jennifer Lin M.D

2020.04.01- Med Legal Supplemental Report - Adam Stoller MD

2020.04.01- Med Legal Supplemental Report - Adam Stoller MD

2020.03.25- Visit Note - Pain & Rehabilitative - Babak Jamasbi M.D.

2020.03.11- SOAP Notes - Andreas Schwerte O.M.D.

2020.02.26- Visit Note - Pain & Rehabilitative - Babak Jamasbi M.D.

2020.02.10- EMG Report -Dr. Neeti Bathia

2020.01.15- Visit Note -Dr. Babak Jamasbi

2020.01.10- Visit Note - Pain & Rehabilitative - Babak Jamasbi M.D.

2019.11.22 - Medical Report - Babak MD

2019.11.17 - Acupuncture Therapy Notes

2019.11.05- SOAP Notes -Andreas Schwerte, O.M.D.

2019.10.21 - Medical Report - Jamasbi MD

2019.08.05 - Daily Note - Dr Annie Ting

2018.02.15 - Medical Report - Dr Annie Ting

2019.10.10 - Applicant's Deposition Transcript